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 BEST BUY STORES, L.P.; BESTBUY.COM,
 L.L.C.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Mater Case No.: 3:07-cv-05944-SC
 MDL No. 1917
 Individual Case Nos.
 3:11-cv-05513-SC;
 3:13-cv-05264-SC

This document relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC

Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC

Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC

Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC

Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al., No. 11-cv-05502-SC

Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al., No. 11-cv-5514

**DECLARATION OF JILL S.
 CASSELMAN IN SUPPORT OF
 PLAINTIFFS' OPPOSITION TO
 DEFENDANTS' MOTION *IN LIMINE*
 NO. 11 TO EXCLUDE REFERENCES
 TO DOCUMENTS OR BEHAVIOR
 NOT IN EVIDENCE**

Judge: Hon. Samuel Conti

1 *Sharp Electronics Corporation, et al. v.*
 2 *Hitachi, Ltd., et al., No. 13-cv-01173-SC*

3 *Sharp Electronics Corp., et al. v. Koninklijke*
 4 *Philips Electronics N.V., et al., No. 13-cv-2776*
 5 *SC*

6 *ViewSonic Corporation v. Chunghwa Picture*
 7 *Tubes, Ltd., et al., No. 14-cv-02510*

8 I, JILL S. CASSELMAN, declare as follows:

9 1. I am an attorney with the law firm of Robins Kaplan LLP, counsel for Plaintiffs
 10 Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc.,
 11 Best Buy Stores, L.P., and Bestbuy.com, L.L.C. (collectively “Best Buy”) in the
 12 above-captioned action currently pending in the U.S. District Court for the
 13 Northern District of California. I submit this declaration in support of Plaintiffs’¹
 14 Opposition to Defendants’ Motion *in Limine* No. 11 to Exclude References to
 15 Documents or Behavior Not in Evidence. I have personal knowledge of the facts
 16 stated herein, and I could and would competently testify thereto if called as a
 17 witness.

18 2. Attached hereto as **Exhibit 1** is a true and correct copy of selections from the
 19 Expert Report of Dr. Kenneth G. Elzinga, dated April 15, 2014, and designated as “Highly
 20 Confidential.” (FILED UNDER SEAL.)

21 3. Attached hereto as **Exhibit 2** is a true and correct copy of selections from the
 22 Expert Rebuttal Report of Dr. Kenneth G. Elzinga, dated September 26, 2014, and designated as
 23 “Highly Confidential.” (FILED UNDER SEAL.)

24 4. Attached hereto as **Exhibit 3** is a true and correct copy of E-Mail Communications
 25 cited in the Elzinga Rebuttal Report, and designated as “Highly Confidential.” (FILED UNDER
 26 SEAL.)

27 5. Attached hereto as **Exhibit 4** is a true and correct copy of an E-Mail
 28 Communication cited by the Elzinga Rebuttal Report, and designated as “Highly Confidential.”
 (FILED UNDER SEAL.)

¹ For purposes to this Declaration, “Plaintiffs” refers to Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P. and Bestbuy.com, L.L.C., Alfred H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust, Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc., Sears, Roebuck and Co., and Kmart Corporation, Target Corp., and ViewSonic Corp.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Transcript of the Change of Plea Hearing in *United States v. Samsung SDI Co., Ltd.*, No. 3:11-CR-00162-WHA, Dkt. No. 35, dated May 24, 2011.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Amended Plea Agreement in *United States v. Samsung SDI Co., Ltd.*, No. 3:11-CR-00162-WHA, Dkt. No. 40-1, filed August 8, 2011.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Notice of Limitation of Damages Pursuant to ACPERA, filed by the Chunghwa defendants on January 15, 2015 in , *In Re: Cathode Ray Tube (CRT) Antitrust Litigation*, 07-cv-05944-SC, MDL Dkt. No. 3395.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 27th day of February, 2015 in Los Angeles, California.

/s/ Jill S. Casselman

Jill S. Casselman